REMARKS

.Applicant appreciates the Office's review of the present application. In response to the Office Action, the cited references have been reviewed, and the rejections and objections made to the claims by the Examiner have been considered. The claims presently on file in the present application are believed to be patentably distinguishable over the cited references, and therefore allowance of these claims is earnestly solicited.

In order to render the claims more clear and definite, and to emphasize the patentable novelty thereof, claims 1, 7, 18, and 35 have been amended, claims 6 and 23 have been cancelled without prejudice, and new claims 38-41 have been added. Support for any claim amendments and new claims is found in the specification, claims, and drawings as originally filed, and no new matter has been added. Accordingly, all elected claims presently on file in the subject application are in condition for immediate allowance, and such action is respectfully requested.

Rejections

Rejection Under 35USC §101

Claim 6 has been rejected under 35 USC §101 as directed to non-statutory subject matter. In view of this rejection, claim 6 has been canceled. Therefore, the rejection of claim 6 is moot.

Rejection Under 35USC §103

Claims 1, 5, 7, 11-12, 14, and 35-36 have been rejected under 35 USC §103(a), as being unpatentable over U.S. patent application publication 2003/0154308 to Tang et al. ("Tang") in view of U.S. patent 5,991,713 to Unger et al. ("Unger"). Applicants respectfully traverse the rejection and request reconsideration.

As to a rejection under §103(a), the U.S. Patent and Trademark Office ("USPTO") has the burden under §103 to establish a *prima facie* case of obviousness by showing some objective

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teaching in the prior art or generally available knowledge of one of ordinary skill in the art that

would lead that individual to the claimed invention. _See In re Fine, 837 F.2d 1071, 5 U.S.P.Q.2d_

1596, 1598 (Fed. Cir. 1988). The Manual of Patent Examining Procedure (MPEP) section 2143

discusses the requirements of a _prima facie_ case for obviousness. That section provides as

follows:

> To establish a _prima facie_ case of obviousness, three basic criteria
> must be met. First, there must be some suggestion or motivation, either in the
> references themselves or in the knowledge generally available to one of
> ordinary skill in the art, to modify the reference or to combine reference
> teachings. Second, there must be a reasonable expectation of success.
> Finally, the prior art reference (or references when combined) must teach or
> suggest all the claim limitations. The teaching or suggestion to make the
> claimed combination and reasonable expectation of success must be found in
> the prior art, and not based on applicant's disclosure.

The rejection of independent claim 1, and its dependent claims 5 and 36, is respectfully

traversed for at least the following reasons. Claim 1 recites:

"1. (Currently amended) A method of responding to a request for information, the
method comprising:
caching a compression dictionary at a server;
receiving at the server a request for information from a requestor, wherein the request is
in compressed form;
decompressing the received request for information at the server using the cached
compression dictionary;
processing the decompressed request at the server so as to generate requested information
at the server;
compressing the requested information at the server using the cached compression
dictionary; and
sending the compressed information from the server to the requestor with an identifier of
the compression dictionary." (emphasis added)

The Office has not established a _prima facie_ case of obviousness at least because the

applied references do not teach or suggest all of Applicant's claim limitations.

With regard to the limitation of decompressing the received request for information at the

server, the Office states that "'a proxy receives the compressed request from the client, decompresses the compressed data, and <u>communicates the decompressed data to an appropriate destination server</u>' (Paragraph 30)" (Office Action, 8; emphasis added). Also, with regard to the limitation of compressing the requested information at the server, the Office states that "'The proxy compresses the document from the server' (Paragraph 36) and 'In a step 385, the proxy communicates the compressed response to the client' (Paragraph 37)" (Office Action, p.8). Thus, the Office equates <u>proxy 120</u> (Fig. 1) of the Tang reference to the server recited in claim 1.

Claim 1 as amended, however, further recites that the decompressed request is processed <u>at the server</u> so as to generate requested information <u>at the server</u>. However, proxy 120 of the Tang reference, as admitted by the Office, does not process the decompressed request or generate the request information. Rather, a destination server (i.e. server 130) <u>different from the proxy 120</u> "processes the request and returns the response to proxy 120" (para. [0025]). Therefore, the Tang reference does not teach or suggest at least these limitations.

Furthermore, the Office does not cite the Unger reference as teaching these limitations, and Applicant believes the Unger reference does not teach or suggest these limitations.

Therefore, for the reasons discussed herein, the applied references do not teach or suggest all of Applicant's claim limitations.

In addition, the Office has not established a *prima facie* case of obviousness at least because there is no suggestion or motivation to modify the reference or to combine reference teachings. The stated motivation (Office Action, p.9) of using the teachings of the Unger reference to prevent dictionary inefficiencies is merely a conclusory statement of generalized advantages offered by the Unger reference, not a suggestion or motivation to combine the Unger reference with the Tang reference. Using these overly broad statements to create the claimed combination recited in claim 1 impermissibly uses Applicant's disclosure as a blueprint or in hindsight for the rejection. Furthermore, even if such inefficiencies were, arguendo, to be found in the Teng reference, the Tang reference teaches away from the combination or modification by

disclosing that "[b]ulk compression techniques that ... do not require any code space handling, such as Zlib, Huffman, and LZM can also be used" (para. [0027]; emphasis added; code space is equated to a dictionary, see para. [0022]-[0024]). Because there is no credible motivation or suggestion to combine provided by the Office, it is improper to combine the Tang and Unger references.

Applicant respectfully traverses the Office's assertion that it would have been obvious to a person of ordinary skill in the art at the time the invention was made to include the features recited in the claims of Applicant's invention. Such could be possible only in hindsight and in light of Applicant's teachings. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Independent claims 7 and 35 (both currently amended) each recite limitations similar to those of claim 1, discussed above.

Claim 7 recites:

"7. (Currently amended) A method of sending a request for information, the method comprising:
   caching a compression dictionary at a client;
   compressing a request for information at the client using the cached compression dictionary;
   sending the compressed request for information from the client to a server;
   receiving at the client the requested information from the server, wherein the information received is generated by the server in response to the request and compressed by the server; and
   decompressing the requested information at the client using the cached compression dictionary." (emphasis added)

Claim 35 recites:

"35. (Currently amended) A method of responding to a request for information, the method comprising:
   creating a compression dictionary tailored for selected information;
   receiving at a server a request for at least a portion of the selected information from a requestor, wherein the request is in compressed form;
   decompressing the received request at the server using the compression dictionary;
   customizing the information for the requestor at the server;

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dynamically compressing the customized requested information at the server using the compression dictionary; and

sending the compressed information from the server to the requestor with an identifier of the compression dictionary." (emphasis added)

For similar reasons as explained heretofore with regard to claim 1, the features of the present invention are not taught or suggested by the cited references in that the features of generating the requested information on the same server that also decompresses the request and compresses the information are neither taught nor suggested by the Tang reference in combination with the Unger reference.

Applicant respectfully traverses the Office's assertion that it would have been obvious to a person of ordinary skill in the art at the time the invention was made to include the features recited in the claims of Applicant's invention. Such could be possible only in hindsight and in light of Applicant's teachings. Therefore, the rejection of independent claims 7 and 35, and their corresponding dependent claims 11-12 and 14, is improper at least for that reason and should be withdrawn.

Claims 2-3 and 9-10 have been rejected under 35 USC §103 (a), as being unpatentable over U.S. patent application publication 2003/0154308 to Tang et al. ("Tang") in view of U.S. patent 5,991,713 to Unger et al. ("Unger"), and further in view of U.S. patent application publication 2002/0029229 to Jakopac et al. ("Jakopac"). Applicant respectfully traverses the rejection and requests reconsideration at least based on the dependence of these claims on one of independent claims 1 and 7, whose reasons for allowability over the Tang and Unger references have been discussed heretofore and against which the Jakopac reference has not been cited. In addition, the stated motivation to combine the references is improper in that it is merely a conclusory statement of generalized advantages that impermissibly uses the Applicant's disclosure as a blueprint or in hindsight for the rejection. Therefore, the rejection is improper at least for these reasons and should be withdrawn.

Claims 13, 18-19, 22, and 37 have been rejected under 35 USC §103 (a), as being
unpatentable over U.S. patent application publication 2003/0154308 to Tang et al. ("Tang") in
view of U.S. patent 5,991,713 to Unger et al. ("Unger"), and further in view of U.S. patent
application publication 2003/0023628 to Girardot et al. ("Girardot"). Applicant respectfully
traverses the rejection and requests reconsideration.

With regard to claim 13, Applicant respectfully traverses the rejection at least based on
the dependence of this claim on independent claim 7, whose reasons for allowability over the
Tang and Unger references have been discussed heretofore and against which the Girardot
reference has not been cited. In addition, the stated motivation to combine the references is
improper in that it is merely a conclusory statement of generalized advantages that impermissibly
uses the Applicant's disclosure as a blueprint or in hindsight for the rejection. Therefore, the
rejection is improper at least for these reasons and should be withdrawn.

The rejection of independent claim 18, and its dependent claims 19, 22, and 37, is
respectfully traversed for at least the following reasons. Claim 18 recites:

"18. (Currently amended) A method of communicating over a network, the method
comprising:
creating a compression dictionary from a web services description language of a web
service;
publishing the compression dictionary on a network resource, wherein the compression
dictionary is retrievable via an HTTP get request to the web service;
retrieving the compression dictionary from the network resource;
caching the compression dictionary; and
compressing and decompressing messages received from or sent to the web service
according to the compression dictionary, wherein the messages include markup tags, and wherein
the markup tags are compressed and decompressed." (emphasis added)

The Office has not established a *prima facie* case of obviousness at least because the
applied references do not teach or suggest all of Applicant's claim limitations.

With regard to the limitation of creating the compression dictionary, the Tang reference
teaches that "the proxy dynamically generates a new code space" (para. [0035]), but fails to

disclose that the dictionary is created <u>from a web services description language of a web service,</u> as recited in claim 18 as amended.

The Office does not cite the Unger or Girardot references as teaching such a limitation, and Applicant believes these references, alone or in combination, teach no such limitation.

Therefore, for the reasons discussed herein, the applied references do not teach or suggest all of Applicant's claim limitations.

Furthermore, the Office has not established a *prima facie* case of obviousness at least because there is no suggestion or motivation to modify the reference or to combine reference teachings of at least the Tang and Unger references, as described heretofore with regard to claim 1.

Applicant respectfully traverses the Office's assertion that it would have been obvious to a person of ordinary skill in the art at the time the invention was made to include the features recited in the claims of Applicant's invention. Such could be possible only in hindsight and in light of Applicant's teachings. Therefore, the rejection is improper at least for that reason and should be withdrawn.

Claims 20-21 have been rejected under 35 USC §103 (a), as being unpatentable over U.S. patent application publication 2003/0154308 to Tang et al. ("Tang") in view of U.S. patent 5,991,713 to Unger et al. ("Unger"), further in view of U.S. patent application publication 2003/0023628 to Girardot et al. ("Girardot "), and still further in view of U.S. patent application publication 2002/0029229 to Jakopac et al. ("Jakopac"). Applicant respectfully traverses the rejection and requests reconsideration at least based on the dependence of these claims on independent claim 18, whose reasons for allowability over the Tang, Unger, and Girardot references have been discussed heretofore and against which the Jakopac reference has not been cited. In addition, the stated motivation to combine the references is improper in that it is merely a conclusory statement of generalized advantages that impermissibly uses the Applicant's disclosure as a blueprint or in hindsight for the rejection. Therefore, the rejection is improper at

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least for these reasons and should be withdrawn.

Conclusion

Attorney for Applicant has reviewed each one of the cited references made of record and not relied upon, and believes that the claims presently on file in the subject application patentably distinguish thereover, either taken alone or in combination with one another.

Therefore, all claims presently on file in the subject application are in condition for immediate allowance, and such action is respectfully requested. If it is felt for any reason that direct communication with Applicant's attorney would serve to advance prosecution of this case to finality, the Examiner is invited to call the undersigned Robert C. Sismilich, Esq. at the below-listed telephone number.